

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

G. KENT PLUNKETT,
Plaintiff,

vs.

VALHALLA INVESTMENT SERVICES,
INC. AND ERIC T. HOUSE
Defendant.

CIVIL ACTION NO. 04-10765-NG

JOINT SCHEDULING CONFERENCE STATEMENT

The parties submit this Joint Statement pursuant to the Court's Notice of Scheduling Conference.

Nature of the Case

Plaintiff invested \$1,000,000 with defendants. Plaintiff asserts that defendants allocated losses and gains after the fact between Plaintiff and Defendants' fund and other investors. Defendants deny this allegation and assert that there is no basis for the claims. The Complaint contains claims for breach of fiduciary duty and violation of Section 10(B) of the Exchange Act and Chapter 110A of the Massachusetts Securities Act.

Agenda for Scheduling Conference

There are no pending motions. The parties submit that the agenda for the Scheduling Conference should focus on the schedule for the litigation. However, Defendants do intend to file a Motion to Dismiss based on several grounds, and the proposed schedule is based on the expected time to brief and argue Defendants' Motion to Dismiss.

Discovery Plan

1. Joinder of Additional Parties – May 31, 2005
2. Fact Discovery Closes – September 30, 2005

3. Expert Witnesses Discovery Closes – December 2, 2005
 - a. Expert Witness Reports on which Party Bears the Burden of Proof Due – September 30, 2005
 - b. Expert Witness Reply Reports Due – October 21, 2005
 - c. Expert Witness Rebuttal Reports Due – November 4, 2005
4. Dispositive Motions Filed – January 6, 2006
5. Final Pre-Trial Conference – March 2006
6. Trial (3 days) – April 2006 (or on Court's availability)

Consent to Trial by Magistrate

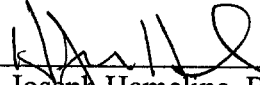
The parties do not consent to trial before a Magistrate Judge.

Certifications

The parties will separately submit their certifications with respect to the costs of litigation and ADR.

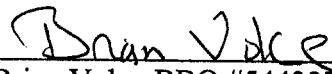
G. KENT PLUNKETT

By his attorney,


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VALHALLA INVESTMENT
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Dated: January 31, 2005